IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

W.R. GRACE & CO., et al., Case No. 01-1139 (JKF)
Jointly Administered

Debtors.

NOTICE OF APPEARANCE, REQUEST FOR MATRIX ENTRY AND REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS

TO: Clerk of the Court
United States Bankruptcy Court
District of Delaware
824 Market Street

Wilmington, DE 19801

Please enter the appearance of Rachel B. Mersky, Esquire of the firm of Monzack Mersky McLaughlin and Browder, P.A, and Greg A. Lowry, Esquire of the firm of Locke Lord Bissell & Liddell, LLP as counsel for Samson Hydrocarbons ("Samson"). Samson is a party in interest and, pursuant to the Bankruptcy Rules and Section 1109(b) of the Bankruptcy Code, hereby request that all notices given or required to be given in these cases be given to and served upon:

Rachel B. Mersky, Esquire
MONZACK MERSKY McLAUGHLIN and
LOCKE LORD, LLP

BROWDER, P.A. 2200 Ross Avenue, Suite 2200

1201 N. Orange Street, Suite 400 Dallas, Texas 75201

Wilmington, DE 19801 Telephone: (214) 740- 8707 Telephone: (302) 656-8162 Facsimile: (214) 740- 8800

Facsimile: (302) 656-2769 Email: galowr@lockelord.com Email: rmersky@monlaw.com

Please take further notice that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices referred to in the Bankruptcy Rules but also

includes, without limitation, notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, filed in this Chapter 11 case.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Samson's right: (1) to have final orders in noncore matters entered only after <u>de novo</u> review by a District Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) or any other rights, claims, actions, defenses, setoffs, or recoupments to which Samson is or may be entitled, in law or in equity, all of which Samson expressly reserves.

Dated: April 8, 2014 MONZACK MERSKY McLAUGHLIN AND BROWDER, P.A.

/s/ Rachel B. Mersky

Rachel B. Mersky, Esquire (DE #2049) 1201 N. Orange Street, Suite 400 Wilmington, DE 19801-1155

Telephone: (302) 656-8162 Facsimile: (302) 656-2769

Email: rmersky@monlaw.com

Attorneys for Samson Hydrocarbons